

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

MARCIA FREDERICK, individually, and )  
on behalf of all others similarly situated, )

*Plaintiffs,* )

v. )

C.A. No. 1:18-cv-11299-IT

UNITED STATES OLYMPIC )  
COMMITTEE, USA GYMNASTICS )  
(formerly known as the United States )  
Gymnastics Federation), RICHARD )  
CARLSON, MURIEL GROSSFELD, )  
GEORGE WARD, )

*Defendants.* )

**NOTICE OF VOLUNTARY DISMISSAL WITH PREJUDICE**  
**PURSUANT TO F.R.C.P. 41(a)(1)(A)(i)**

COMES NOW Plaintiff, and pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i), hereby voluntarily dismisses all claims in this action against Defendants Muriel Grossfeld and George Ward with prejudice, each party to bear its own costs.

Dated: November 16, 2018

Respectfully submitted,

Plaintiff,

/s/ Kimberly A. Dougherty

Kimberly A. Dougherty (BBO. No. 658014)

Vance Andrus (to be admitted *pro hac vice*)

Aimee Wagstaff (to be admitted *pro hac vice*)

Lisa Lee (BBO. No. 684631)

ANDRUS WAGSTAFF, PC

19 Belmont Street

South Easton, MA 02375

(t) 508-230-2700

(f) 888-875-2889

[kim.dougherty@andruswagstaff.com](mailto:kim.dougherty@andruswagstaff.com)

AND

Lori E. Andrus (admitted *pro hac vice*)  
Jennie Lee Anderson (admitted *pro hac vice*)

ANDRUS ANDERSON LLP  
155 Montgomery Street, Suite 900  
San Francisco, California 94104  
(t) 415-986-1400  
(f) 415-986-1474  
[lori@andrusanderson.com](mailto:lori@andrusanderson.com)  
[jennie@andrusanderson.com](mailto:jennie@andrusanderson.com)

**CERTIFICATE OF SERVICE**

I, Kimberly A. Dougherty, hereby certify that a true and correct copy of the above and foregoing has been served on all known counsel of record via ECF, for those counsel registered to receive filings via ECF, on November 16, 2018.

/s/ Kimberly A. Dougherty  
Kimberly A. Dougherty